

Exhibit 48

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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5 FRANCESCO GALLO,

6 Plaintiff,

7 -against-

Case No.

07CV06418 (CM) (HP)

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ALITALIA-LINEE AEREE ITALIANE-

SOCIETA PER AZIONI, PIERANDREA GALLI,

9

and GIULIO LIBUTTI,

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Defendants.

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DEPOSITION OF MARCO D'ILARIO

New York, New York

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Wednesday, March 12, 2008

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22 Reported by: CAPRICE LATHE

Job No.: 10350

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1 M. D'ILARIO

2 lower one. Probably Libutti has a higher tone of
3 voice. So if he -- you mean if he was insulting me?
4 No, he wasn't.

5 Q Was he ever mad at you and raising his
6 tone of voice, as you say?

7 MR. KORAL: Objection.

8 A I don't recall to have any arguments with
9 Mr. Libutti. We had a very good working
10 relationship of usually discussing things. Maybe
11 sometimes we didn't agree about vision of the
12 business, but we were always able to find the right
13 compromise.

14 Q So if I said that Mr. Libutti frequently
15 yelled at you in the mornings when Mr. Gallo was not
16 in yet, you would say that that's not true?

17 A Absolutely yes, it is not true.

18 Q Did you know Gabriele Mariotti well?

19 A Working -- I know him in a work
20 environment.

21 Q Do you know if you had more sales
22 experience than Mr. Mariotti?

23 A I have no clue about how good is Mr.
24 Mariotti's sales.

25 Q And you never heard any employee at

1 M. D'ILARIO

2 Alitalia ever refer to Mr. Mariotti as gay or
3 frocio?

4 A Absolutely don't remember such an insult.

5 Q How about older workers, have you ever
6 heard any comments about older workers at Alitalia?

7 A What do you mean by older?

8 Q Older than 50. The equivalent of -- did
9 Libutti or Galli ever refer to any older workers as
10 old bags or old, fill in the blank, say anything you
11 want after that?

12 MR. KORAL: Objection.

13 Q As old?

14 MR. KORAL: How about old friend?

15 MR. SMITH: Fine. I will take it.

16 Q Has anybody been referred to as old
17 anything by Libutti or Galli?

18 A I don't remember such expression.

19 Q Did you know Dolores Kitzig?

20 A Yes.

21 Q Was she fired?

22 A To my knowledge, no. I think she is
23 working in Alitalia.

24 Q She still works there?

25 A I think so.